

IN THE UNITED STATES COURT OF APPEALS
FOR THE ELEVENTH CIRCUIT
CASE NO. 24-13718-D

DONNAHUE GEORGE,
Plaintiff-Appellant,

v.

KEN GRIFFIN, et al.,
Defendants-Appellees.

Appeal from the United States District Court
for the Southern District of Florida

District Court Docket No. 0:21-cv-61719-KMM

**DEFENDANT-APPELLEE THE DEPOSITORY TRUST & CLEARING
CORPORATION'S MOTION TO ADOPT DEFENDANTS-APPELLEES
KEN GRIFFIN, CITADEL ENTERPRISE AMERICAS LLC (FORMERLY
CITADEL LLC), CITADEL SECURITIES LLC, AND
ROBINHOOD FINANCIAL LLC'S BRIEF**

**CERTIFICATE OF INTERESTED PERSONS AND CORPORATE
DISCLOSURE STATEMENT**

Pursuant to Federal Rule of Appellate Procedure 26.1 and 11th Circuit Rule 26.1-2, the undersigned counsel hereby certify as follows:

Defendant-Appellee The Depository Trust & Clearing Corporation does not have a parent corporation and no publicly-held corporation has a 10% or greater ownership interest in The Depository Trust & Clearing Corporation.

The following is a complete list, in alphabetical order, of interested persons:

1. Boyle, Gregory M. (counsel for The Depository Trust & Clearing Corporation)
2. Carlson & Associates, P.A. (counsel for The Depository Trust & Clearing Corporation)
3. Carlson, Curtis (counsel for The Depository Trust & Clearing Corporation)
4. Citadel Enterprise Americas LLC (formerly Citadel LLC)
5. Citadel GP LLC
6. Citadel Securities GP LLC
7. Citadel Securities LLC
8. Cravath, Swaine & Moore LLP (counsel for Robinhood Financial LLC)
9. Danon, Samuel A. (counsel for Robinhood Financial LLC)
10. The Depository Trust & Clearing Corporation
11. Financial Industry Regulatory Authority, Inc.

12. Fountain, Peter H. (counsel for Ken Griffin, Citadel Enterprise Americas LLC
(formerly Citadel LLC), and Citadel Securities LLC)
13. George, Donnahue
14. Griffin, Kenneth
15. Hunton Andrews Kurth LLP (counsel for Robinhood Financial LLC)
16. Jenner & Block LLP (counsel for The Depository Trust & Clearing
Corporation)
17. Mandel & Mandel LLP (counsel for Financial Industry Regulatory Authority,
Inc.)
18. Mandel, David S. (counsel for Financial Industry Regulatory Authority, Inc.)
19. Moore, K. Michael, U.S. District Court Judge, Southern District of Florida
20. Orsini, Kevin J. (counsel for Robinhood Financial LLC)
21. Quinn Emanuel Urquhart & Sullivan, LLP (counsel for Ken Griffin, Citadel
Enterprise Americas LLC (formerly Citadel LLC), and Citadel Securities LLC)
22. Robinhood Financial LLC
23. Robinhood Markets, Inc. (stock ticker HOOD) (parent company of Robinhood
Financial LLC)
24. Ryan, Antony L. (counsel for Robinhood Financial LLC)
25. Schulte, Tom K. (counsel for Robinhood Financial LLC)

26. Shaffer, Derek L. (counsel for Ken Griffin, Citadel Enterprise Americas LLC
(formerly Citadel LLC), and Citadel Securities LLC)
27. Valle, Alicia O., U.S. Magistrate Judge, Southern District of Florida
28. Sternberg, Jason (counsel for Ken Griffin, Citadel Enterprise Americas LLC
(formerly Citadel LLC), and Citadel Securities LLC)
29. Sukiennik, Brittany L. (counsel for Robinhood Financial LLC)
30. Unikowsky, Adam G. (counsel for The Depository Trust & Clearing
Corporation)

**MOTION TO ADOPT THE CITADEL DEFENDANTS AND
ROBINHOOD’S BRIEF**

Defendant-Appellee The Depository Trust & Clearing Corporation (“DTCC”), by and through undersigned counsel, and pursuant to Fed. R. App. P. 28(i) and 11th Cir. R. 28(i), moves to adopt the Brief of Defendants-Appellees Ken Griffin, Citadel Enterprise Americas LLC (formerly Citadel LLC), Citadel Securities LLC (collectively, the “Citadel Defendants”), and Robinhood Financial LLC’s (“Robinhood”) (ECF No. 28) in its entirety.

The arguments presented in the Citadel Defendants and Robinhood’s Brief equally apply to the claims against DTCC. In lieu of filing an additional brief that repeats the arguments amply made by the Citadel Defendants and Robinhood, DTCC hereby joins and supports those arguments by way of this motion. Doing so both conserves judicial resources and ensures that this Court is not encumbered with the review of duplicative arguments.

DATED: February 3, 2025

Respectfully submitted,

/s/ Gregory M. Boyle

JENNER & BLOCK LLP

Gregory M. Boyle

353 N. Clark Street

Chicago, IL 60654

Telephone: (312) 923-2651

gboyle@jenner.com

***Counsel for The Depository Trust
& Clearing Corporation***

CERTIFICATE OF COMPLIANCE

Pursuant to Rule 32(g) of the Federal Rules of Appellate Procedure, the undersigned counsel certifies that this motion complies with the type-volume limitation of Rule 32(a)(7)(B) of the Federal Rules of Appellate Procedure. This motion contains 143 words, excluding the parts of the motion exempted by Federal Rule of Appellate Procedure 32(f).

This Brief complies with the typeface requirements of Federal Rule of Appellate Procedure 32(a)(5) and the type-style requirements of Federal Rule of Appellate Procedure 32(a)(6) because this motion has been prepared in a proportionally spaced typeface using Microsoft Office Word in Times New Roman type style, font size 14.

Dated: February 3, 2025

/s/ Gregory M. Boyle
Gregory M. Boyle

CERTIFICATE OF SERVICE

I hereby certify that on February 3, 2025, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record or *pro se* parties identified on the attached service list in the manner specified, either via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive Notices of Electronic Filing.

Dated: February 3, 2025

/s/ Gregory M. Boyle

Gregory M. Boyle

SERVICE LIST

All counsel of record, via ECF

Plaintiff Donnahue George, via ECF and email
1012 NW 2nd Street
Fort Lauderdale, FL 33311
donnahuegeorge@gmail.com
Pro Se